

**UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF NORTH CAROLINA**

UNITED STATES OF AMERICA,  
STATE OF NORTH CAROLINA,  
STATE OF CALIFORNIA,  
STATE OF COLORADO,  
STATE OF CONNECTICUT,  
STATE OF ILLINOIS,  
COMMONWEALTH OF  
MASSACHUSETTS,  
STATE OF MINNESOTA,  
STATE OF OREGON, and  
STATE OF TENNESSEE,

Plaintiffs,

v.

REALPAGE, INC.,  
CAMDEN PROPERTY TRUST,  
CORTLAND MANAGEMENT, LLC,  
CUSHMAN & WAKEFIELD, INC.,  
GREYSTAR REAL ESTATE  
PARTNERS, LLC,  
LIVCOR, LLC,  
PINNACLE PROPERTY  
MANAGEMENT SERVICES, LLC, and  
WILLOW BRIDGE PROPERTY  
COMPANY, LLC

Defendants.

Case No. 1:24-cv-00710-WO-JLW

**CUSTOMER DEFENDANTS' MOTION TO  
DISMISS THE AMENDED COMPLAINT**

**ORAL ARGUMENT REQUESTED**

Defendants Camden Property Trust, Cushman & Wakefield, Inc., Greystar Real Estate Partners, LLC, LivCor, LLC, Pinnacle Property Management Services, LLC, and Willow Bridge Property Company, LLC (collectively, the "Customer Defendants") move the Court to dismiss plaintiffs' amended complaint with prejudice under Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted.

As more fully set forth in Customer Defendants' accompanying memorandum of law, the grounds for this motion are as follows:

1. The Court should dismiss plaintiffs' claims because plaintiffs fail to plead the facts necessary to allege an antitrust conspiracy.

2. The Court should dismiss plaintiffs' claims because plaintiffs do not plausibly plead any agreement to exchange information or align prices.

3. The Court should dismiss plaintiffs' claims because plaintiffs fail to allege anticompetitive effects.

4. The Court should dismiss plaintiffs' state-law claims because they fall with their federal law claims.

WHEREFORE, Customer Defendants respectfully move the Court to dismiss plaintiffs' amended complaint with prejudice.

Respectfully submitted this 10th day of April, 2025.

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